

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

GISELLE NEVAREZ, et al.,)	
)	
Plaintiffs,)	
)	
v.)	No. 24 C 2447
)	
HIGH HEELS DANCING CO. et al.)	Judge Maniah S. Shah
d/b/a/ HIGH HEELS GENTLEMEN'S)	Magistrate Jeffrey T. Gilbert
CLUB, and KONSTANTIN)	
MATHIOUDAKIS,)	
Defendants.)	

**DEFENDANT HIGH HEELS DANCING CO. MOTION TO STAY
ALL FURTHER PROCEEDINGS IN THIS MATTER**

Defendant, High Heels Dancing Co., moves this Court to Stay all further proceedings in this case, and in support of this Motion represents to the Court as follows:

1. Defendant High Heels Dancing Co. filed a proceeding for Bankruptcy with the United States Bankruptcy Court on January 4, 2024. A copy of the Notice of Bankruptcy Case Filing is attached hereto.
2. As set forth on the Notice of Bankruptcy Case Filing, the filing of that bankruptcy case "automatically stays certain collection and other actions against the debtor and the debtor's property.
3. This proceeding falls within those cases which are stayed by the filing of the bankruptcy case by High Heels Dancing Co.
4. As a result of the filing of the bankruptcy case by Defendant High Heels Dancing Co., all further proceedings in this case should be stayed while that bankruptcy case is pending.

WHEREFORE, Defendant High Heels Dancing Co. prays that the Court stay all further proceedings in this case until the conclusion of the proceedings in the bankruptcy case.

S/Wayne B. Giampietro

Attorney for Defendant High Heels Dancing Co.

Wayne B. Giampietro, LLC
840 Audubon Way, Suite 116
Lincolnshire, IL 60069
847- 370-5619
email:
Attorney ID No. 0947776

CERTIFICATE OF SERVICE

I certify that the foregoing copy of DEFENDANT HIGH HEELS DANCING CO.
MOTION TO STAY ALL FURTHER PROCEEDINGS IN THIS MATTER on

Max Barack
Haskell Garfinkel
The Garfinkel Group, LLC.
701 N. Milwaukee Ave, The CIVITAS
Chicago, IL 60642

Salvatore C. Miglore
Salvatore C. Miglore & Assoc.
The Grove Office Park Bldg. B
2100 Manchester Rd., Suite 1072
Wheaton, IL 60187

on the 9th day of January, 2025 before the hour of 5:00 p.m. via email to

,
.com and

s/Wayne B. Giampietro

**United States Bankruptcy Court
Northern District of Illinois**

Notice of Bankruptcy Case Filing



A bankruptcy case concerning the debtor(s) listed below was filed under Chapter 11 of the United States Bankruptcy Code, entered on 01/04/2025 at 4:21 PM and filed on 01/04/2025.

High Heels Dancing Co.
2678 North 48th Road
Somonauk, IL 60552
Tax ID / EIN: 20-1364680
dba High Heels Gentlemen's Club
fka High Heels Saloon & Gentlemen's Club

The case was filed by the debtor's attorney:

Joel A Schechter, ESQ
Law Offices Of Joel Schechter
53 W Jackson Blvd Ste 1522
Chicago, IL 60604
312 332-0267

The case was assigned case number 25-00096.

In most instances, the filing of the bankruptcy case automatically stays certain collection and other actions against the debtor and the debtor's property. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although the debtor can request the court to extend or impose a stay. If you attempt to collect a debt or take other action in violation of the Bankruptcy Code, you may be penalized. Consult a lawyer to determine your rights in this case.

If you would like to view the bankruptcy petition and other documents filed by the debtor, they are available at our Internet home page <http://www.ilnb.uscourts.gov/> or at the Clerk's Office, Eastern Division, 219 S Dearborn, 7th Floor, Chicago, IL 60604.

You may be a creditor of the debtor. If so, you will receive an additional notice from the court setting forth important deadlines.

Jeffrey P. Allsteadt
Clerk, U.S. Bankruptcy Court

PACER Service Center			
Transaction Receipt			
01/04/2025 16:23:34			
PACER Login:	joelschechter	Client Code:	
Description:	Notice of Filing	Search Criteria:	25-00096
Billable Pages:	1	Cost:	0.10